

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

WIKIMEDIA FOUNDATION, *et al.*,

Plaintiffs,

v.

NATIONAL SECURITY AGENCY, *et al.*,

Defendants.

Civil Action No.
1:15-cv-00662-TSE

**UNOPPOSED MOTION FOR EXTENSION OF
ONE BUSINESS DAY TO SUBMIT
DEFENDANTS' SUMMARY JUDGMENT MOTION**

Defendants hereby move for a brief extension of one business day, from Friday, November 9, 2018, until Tuesday, November 13, 2018, to file their forthcoming motion for summary judgment. Defendants also ask that the deadline for Plaintiff's submission of its opposition be correspondingly extended from Friday, December 14, 2018 until Tuesday, December 18, 2018. Defendants do not, with this motion, seek to extend any other deadlines currently on the calendar for further briefing and oral argument on Defendants' summary judgment motion. For the reasons stated below, the Defendants respectfully request that their extension motion be granted.

1. In its September 26, 2018, Order, the Court set forth the following schedule for briefing and oral argument in this matter:

Event	Deadline/Date
Defendants' Motion	November 9, 2018
Plaintiff's Opposition	December 14, 2018
Defendants' Reply	January 18, 2019
Plaintiff's Surreply	February 1, 2019
Defendants' Surreply	February 15, 2019
Oral Argument	March 1, 2019 at 10 a.m.

See ECF No. 158.

2. Defendants have been working diligently to prepare their motion for summary judgment by November 9. However, despite Defendants' best efforts to complete their submission by the current deadline, additional time is needed to address adequately the complex technical issues, concerning transmission of communications on the Internet, that will be presented in Defendants' motion. The press of other national security-related litigation matters, including oral argument, a major discovery deadline, and a dispositive briefing deadline in other district court cases, all aligning during the current week for members of the Defendants' litigation team, has made completion of Defendants' submission by the current deadline especially difficult.

3. The extension Defendants seek is a modest one, amounting to one business day, due to the intervening Veterans' Day holiday celebrated on Monday, November 12.

4. The modest extension that Defendants seek herein would not disturb the other deadlines currently on the calendar in this matter; Defendants seek only to extend the deadline for their summary judgment motion and the Plaintiff's opposition thereto, but not for the subsequent briefing and oral argument.

5. Pursuant to Local Rule 105.9, counsel for the Defendants conferred with Plaintiff's counsel, and was advised that Plaintiff does not oppose the requested extension of the deadline for the Defendants' motion for summary judgment if the deadline for the submission of Plaintiff's opposition is likewise extended until December 18, 2018.

For the foregoing reasons, the Defendants respectfully request that the Court extend the deadline for their summary judgment motion from Friday, November 9, 2018, until Tuesday, November 13, 2018, and that the Court likewise extent the deadline for Plaintiff's opposition from Friday, December 14, 2018 until Tuesday, December 18, 2018.

Dated: November 6, 2018

Respectfully submitted,

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